## UNITED STATES BANKRUPTCY COURT EASTERN DISTRICT OF MICHIGAN SOUTHERN DIVISION

In re:

HENRY FORD VILLAGE, INC.,

Debtor.

Chapter 11

Case No. 20-51066

Hon. Mark A. Randon

## NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS

PLEASE TAKE NOTICE that Anthony J. Kochis of Wolfson Bolton PLLC appears, pursuant to Fed. R. Bankr. P. 9010(b) and 11 U.S.C. § 1109(b), as counsel to Reid Family Revocable Living Trust, u/t/a dated May 15, 2003 ("Reid Trust").

PLEASE TAKE FURTHER NOTICE that Reid Trust requests, pursuant to Fed. R. Bankr. P. 2002 and 11 U.S.C. § 1109(b), that copies of all notices and pleadings given or required to be given, and all papers served or required to be served, be given and served upon the following persons at the address, telephone number, facsimile number, and email address indicated:

Anthony J. Kochis WOLFSON BOLTON PLLC 3150 Livernois, Suite 275 Troy, MI 48083

Telephone: (248) 247-7105 Facsimile: (248) 247-7099 Email: akochis@wolfsonbolton.com

PLEASE TAKE FURTHER NOTICE that, pursuant to 11 U.S.C. §
1109(b), this demand includes not only the notices and papers referred to in the Federal Rules of Bankruptcy Procedure, but also includes all orders and notices of any applications, petitions, motions, complaints, requests or demands, hearings, answering or reply papers, memoranda and briefs in support of any of the foregoing and any other document filed with, or otherwise brought before this Court with respect to the above-referenced bankruptcy proceedings, whether formal or informal, whether written or oral, and whether transmitted or conveyed by U.S. mail, electronic mail, courier service, hand delivery, telephone, facsimile transmission, or otherwise.

PLEASE TAKE FURTHER NOTICE that Reid Trust intends that neither this Notice of Appearance and Request for Service of Papers nor any later appearance, pleading, claim or suit shall waive: (i) Reid Trust's right to have final orders in non-core and certain core matters entered only after *de novo* review by a District Court Judge; (ii) Reid Trust's right to trial by jury in any proceeding so triable in any case, controversy, or proceeding related to these bankruptcy proceedings; (iii) Reid Trust's right to have the District Court withdraw the reference in any matter subject to mandatory or

{00100106.DOCX } 2 20-51066-mar Doc 70 Filed 11/10/20 Entered 11/10/20 10:55:24 Page 2 of 3 discretionary withdrawal, or (iv) any other rights, claims, actions, defenses, setoffs, or recoupments to which Reid Trust is or may be entitled under agreements, in law or in equity, all of which rights, claims, actions, defenses, setoffs, and recoupments Reid Trust reserves.

Respectfully submitted,

WOLFSON BOLTON PLLC

By: /s/ Anthony J. Kochis Dated: November 10, 2020

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